



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
OREGON OPERATIONS OFFICE
811 S.W. 6th Avenue
Portland, Oregon 97204

November 2, 2006

Mr. Jim McKenna
Port of Portland & Co-Chairman, Lower Willamette Group
121 NW Everett
Portland, Oregon 97209

Mr. Robert Wyatt
Northwest Natural & Co-Chairman, Lower Willamette Group
220 Northwest Second Avenue
Portland, Oregon 97209

Re: Portland Harbor Superfund Site; Administrative Order on Consent for Remedial Investigation and Feasibility Study; Docket No. CERCLA-10-2001-0240. Preliminary Upstream & Downstream Sediment Data Evaluation and Round 3A Field Sampling Plan for Upstream & Downstream Sediment Sampling

Dear Messrs. Wyatt and McKenna:

EPA has reviewed the revised Preliminary Upstream & Downstream Sediment Data Evaluation and Round 3A Field Sampling Plan for Upstream & Downstream Sediment Sampling (Upstream & Downstream FSP). This document was prepared on behalf of the Lower Willamette Group (LWG) by Integral Consulting and was submitted on October 13, 2006.

In general, the Upstream & Downstream FSP has been revised in accordance with EPA's comments dated September 13, 2006, and subsequent agreement based on follow-up discussions as documented in Gene Revelas' email to Eric Blischke on September 20, 2006 and summarized below:

- 1) The LWG will collect the downstream samples identified in Table 1 of EPA's comment document.
- 2) The LWG will collect a total of three radioisotope cores in the upper Study Area reach (RM 10-11.5) in known depositional areas.
- 3) The LWG will not collect any sediment samples (cores or grabs) at RM 16 in Round 3A, but will present a further evaluation of the existing upriver data in the Round 2 report and will identify upriver data gaps for Round 3B as a focus of that evaluation.
- 4) LWG acknowledges and appreciates EPA comments on the data evaluation portion of the FSP (Section 2) but will not revise that section in the FSP revision. Instead, that

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evaluation will be expanded, taking into account EPA's comments, and presented in the Round 2 report.

In addition, the revised document states that a revised and expanded version of Section 2, the existing upstream and downstream data evaluation section, which will address EPA comments received on this section in its September 13, 2006 FSP comment letter, will be included in the Comprehensive Round 2 Report.

Please note that, with regards to targeted collection of sediment at two locations upstream of the Study, EPA does not agree with the statement in the document that "any additional work to characterize these potential sources is outside the scope of the Portland Harbor AOC." As stated in our previous comments, EPA will evaluate the results of the sampling in the context of the Portland Harbor RI/FS and determine how to proceed based on the results of the evaluation. However, EPA recognizes that if areas of contamination offshore of the two targeted locations are identified, further characterization of these facilities through the Portland Harbor RI/FS may not be appropriate due to project schedule constraints, and that other vehicles for addressing these potential areas of sediment contamination may need to be pursued.

The revised Upstream & Downstream FSP is hereby approved. Please contact Chip Humphrey at (503) 326-2678 or Eric Blischke (503) 326-4006 if you have any questions. All legal inquiries should be directed to Lori Cora at (206) 553-1115.

Sincerely,



Chip Humphrey
Eric Blischke
Remedial Project Managers

cc: Greg Ulirsch, ATSDR
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